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March 25, 2014

3/26/2014

MEMO ENDORSED

By Ecf
Honorable Denise L. Cote
District Court Judge
Southern District of New York
100 Pearl Street
New York, New York 10003

Re: United States v. Gelman, et. al., S1 09 Cr. 666 (DLC)

Dear Judge Cote:

As the attorney for Gary Gelman in the above-referenced case, I write to request that he be released on bail with appropriate conditions pending trial, pursuant to Fed.R.Crim.P. 46(a), and 18 U.S.C. § 3142.

His Family Is Willing To Put Up A Significant Bail Package

A number of the Defendant's family and friends have come forward to put together an overwhelming bail package to guarantee Mr. Gelman's presence in Court. They are those most dear to him – including his Aunt anf friend -- who are willing to risk their most valuable assets, their homes, because they are so confident that Mr. Gelman will be responsible. Thus, he has properties valued at over $700 Thousand and family and friends that will sign a $2 million dollar bond to secure his presence in Court by the below-listed properties and individuals. Those properties and the family member offering them are as follows:

1. Rimma Khatemlyansky Guarantor and Defendant's resident

   3115 Brighton 6th Street

   Brooklyn, NY 11235 she has a landline (347)462-9728

2. Mila Fishman unencumbered property $357,000

   40 Brighton 1st road apt 10A

   Brooklyn, NY11235

3. Sima Georgiev unencumbered property $400,000

   49A Country Drive East

   Staten Island, NY 10314

4. Alla Cherenkova Guarantor

   505 Elmwood Avenue apt # 4K

   Brooklyn, NY 11230

5. Vera Tolpina Guarantor

   1180 Brighton Beach Avenue, Apt 6D

   Brooklyn, NY 11235

Brooklyn, NY 11235

Moreover, Mr. Gelman will agree to monitoring as the court sees fit and live with his mother at the above stated address. Assistant United States Attorney Mr. Blais has consented to the above stated conditions.

SPECIFIC PROPOSED BAIL CONDITIONS

1. $2 million personal recognizance bond secured by the signature of the six co-signers and, two properties as described above.

2. Surrender of Gelman's passport, plus a condtion that he not apply for any new travel documents.

3. Home detention with electronic monitoring, which is that he would be confined to his mother's home, although he can leave the home for employment approved by Pretrial Services, medical obligations, religious obligations and meetings with counsel, with notification in advance to Pretrial Services of the latter three.

4. Any period he is outside the home, he is not to leave SDNY and EDNY.

CONCLUSION

For the reasons stated above, Gary Gelman should be released pending trial under conditions set forth above or that the Court deems appropriate.

Sal E. Strazzullo, Esq.
Strazzullo Law Firm, P.C.

Denied. Should the defendant wish to be heard orally on this application he shall request a conference through the Courtroom Deputy.

Denise Cote
March 24, 2014